



Major Projects Team
Department of Planning, Industry & Environment
4 Parramatta Square
12 Darcy Street,
Parramatta, NSW 2150

10 June 2022

Attention: James Groundwater

Dear James,

RE: Further Submission to SSD-15882721: State Significant Development Doran Drive Plaza Precinct

This submission has been prepared on behalf of QIC Limited in relation to the exhibition of SSD-15882721, which seeks consent for the construction of a mixed-use development in the Doran Drive Plaza Precinct. Overall, QIC supports the construction of a mixed-use transit-oriented development that promotes the use of the Hills Showground Metro station at 2 Mandala Parade, Castle Hill, however object to the proposed full-line supermarket and subsequent proposal to increase car parking.

The SSDA was placed on public exhibition from 2 August 2021 to 30 August 2021, following which QIC provided a letter of submission dated 30 August 2021. The (then) Department of Planning, Industry and Environment requested the Proponent prepare a response to the issue raised in the submissions in the form of a Response to Submissions Report. The Proponent has since provided a response dated April 2022. QIC requests further consideration of the matters raised in the initial submission letter dated 30 August 2021, which are reiterated with reference to the Proponent's response to submissions.

In summary:

- The proposal deviates from the maximum parking rate controls in the Urban Design Guide and therefore fails to demonstrate design excellence;
- The proposal does not deliver Transit-Oriented Development (TOD);
- The car parking benchmarking exercise is not appropriate for the circumstances in question;
- The response documentation prepared by the Proponent does not adequately address the parking concerns raised by QIC;
- The proposed full-line supermarket will result in poor urban design outcomes; and
- The design documentation prepared by the Proponent fails to justify the bulk and scale of the proposed full-line supermarket.

1. Parking provision

A number of parking-related concerns were raised in QIC's letter of submission dated 30 August 2021. The majority of these concerns appear to be left unaddressed by the Proponent in the Response to Submissions Report.

In considering whether the development exhibits design excellence, Clause 9.5(4)(e) of *The Hills Local Environmental Plan (LEP) 2019* requires the consent authority to have regard to the requirements of the development control plan (DCP) referred to in Clause 9.4. The DCP must provide for:

(d) encouraging sustainable transport, including increased use of public transport, walking and cycling, road access and the circulation network and car parking provision, including integrated options to reduce car use,

Part D, Section 19 (5.11) of The Hills DCP 2012 – Showground Station Precinct requires car parking rates to be determined by a merit-based assessment for retail and commercial uses in the B2 Local Centre zone. DAs are to be accompanied by a traffic and parking study which demonstrates that the parking provision is sufficient to meet the forecast demand. Section 2.8 of the UDG identifies design excellence as the fundamental reason for the production of the UDG. It is therefore considered that the maximum car parking rates in the UDG assist in delivering design excellence across the Showground precinct. Deviating from these controls raises the question as to whether the proposed development would continue to exhibit design excellence in accordance with The Hills LEP 2019. An increase in car parking is not supported as this contradicts the UDG and the principles of design excellence, which both encourage sustainable transport and a reduction in car use. If a full-line supermarket upon the site cannot be supported within the existing car parking parameters prescribed by the UDG, the site is not considered to be suitable for a supermarket of this scale.

Secondly, the site is situated along the new Metro North West Rail Line urban corridor and within the Hills Showground Station Precinct and is considered a strategic transit-oriented development (TOD) site expected to support the provision of more housing and jobs within The Hills Shire LGA. Specifically, the *Greater Sydney Region Plan – A Metropolis of Three Cities*, *Central City District Plan* and *Hills Future 2036: Local Strategic Planning Statement* highlight that Sydney Metro Station precincts are to be planned using transport-oriented design principles that provide a mix of land uses to promote walkability and public domain. The priority to encourage sustainable travel modes, improve active transport accessibility and reduce the reliance of private vehicles is a widely recognised objective across all strategic plans. The delivery of the precinct as TOD is identified as a key component to the overall project.

Thirdly, QIC's initial submission raised the fact that justification of the additional car parking is principally based on a benchmarking comparison of the rates of supply at other shopping centres. However, the key metric should be car parking demands, to which there is little to no reference in the proposal. The dataset provided includes Castle Towers, where it is presented that the rate of supply is 5 car spaces per 100sqm. However, we note that the rate of demand at Castle Towers is closer to 3.7 car spaces per 100sqm. Furthermore, the appropriateness of comparing a local neighbourhood shopping centre to regional shopping centres like Castle Towers should be questioned.

Appendix 32, which has been prepared by Hill PDA in response to QIC's first submission, does not address the specific traffic and parking matters raised by QIC. Hill PDA has noted that traffic and parking is "outside of their expertise". Furthermore, Appendix 23a includes a traffic response letter prepared by Varga Traffic Planning. This traffic response letter is generic in nature and does not provide specific responses to the matters raised in QIC's submission. Instead, the Proponent has aimed to justify the additional parking provision as a way of "providing additional choice" to the residents that "live outside the walkable catchment". This is an inadequate response to QIC's concerns about the overprovision of parking and fails to consider the fact that these local residents should be prioritising public transport as the primary means of travelling to and from the proposed development.

2. Poor land use and urban design

QIC's initial submission raised the fact that the proposed full-line supermarket will detract from the intended mixed-use vibrant centre whereby the future full line supermarket will dominate as the key use

for the site. Whilst appreciating that an anchor tenant is key to a successful retail centre, to develop a full line supermarket with a significant dominant footprint does not allow a true mixed use of the land. The proposal ultimately goes beyond an appropriate scale of retail for the precinct as a local centre and does not provide for the most efficient use of the site. As a result of this dominant footprint, the proposed design to accommodate a full-line supermarket will emphasise a large visual bulk appearance and will give way to a lost opportunity for active frontages along key street elevations to be viewed by pedestrians and shoppers. Blank walls are a widely recognised poor design solution and are commonly recommended to be avoided in all forms of development. Therefore, the overall lack of an articulated façade presents a poor urban design outcome.

The Proponent has not addressed these concerns and fails to justify the proposed bulk and scale which will result in a poor urban design outcome. The Response to Submissions Report prepared by Deicorp report refers to the response prepared by Hill PDA (Appendix 32) to address this matter, however this response reflects that urban design is “outside their expertise”. There is no justification for the proposed bulk and scale of a full line supermarket.

Conclusion

The proposed Doran Drive Plaza Precinct SSDA aims to deliver a vibrant commercial and residential precinct that will enhance the Hills Showground Station. Whilst QIC supports the proposed development’s intention to increase housing and best optimise investment of the North Metro West Rail Line, concern is raised about the proposed full-line supermarket and subsequent increase in carparking. Specifically, the implications of this on the long-term strategic centre capabilities of QIC’s assets in Castle Hill.

Further to our initial submission dated 30 August 2021, QIC’s existing concerns about the proposal still stand and we recommend the development be amended to:

- Accommodate reasonable parking provision to demonstrate design excellence and transit-oriented development (TOD); and
- Incorporate a true mixed-use approach to the proposed land use and urban design, instead of a full-line supermarket.

QIC welcomes the opportunity to comment on the SSDA and looks forward to further opportunities to engage with and contribute to the future strategic planning process for The Hills Shire and specifically the Castle Hill strategic centre. We look forward to the opportunity to continue to work together to create a vibrant town centre in Castle Hill to meet the needs of the existing and future community.

Yours sincerely

David Tewksbury

Investment Manager